

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

RICHARD STANCL,

Plaintiff,

v.

**MIDLAND CREDIT
MANAGEMENT, INC.,**

Defendant.

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CASE NO.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant Midland Credit Management, Inc. (“MCM”) hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Carbon County, Pennsylvania and in support thereof avers as follows:

1. MCM is the Defendant in a civil action originally filed on March 28, 2024, in the Court of Common Pleas of Carbon County, Pennsylvania titled *Richard Stancl v. Midland Credit Management, Inc.* and docketed to Case No. 24-cv-0591.
2. This removal is timely under 28 U.S.C. § 1446(b). MCM received service of Plaintiff’s Complaint by Certified Mail on April 9, 2024.
3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all pleadings, process and orders filed in the state court action.

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against the Defendant alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, MCM has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Carbon County, Pennsylvania.

WHEREFORE, Defendant Midland Credit Management Inc. respectfully removes this case to the United States District for the Middle District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER BURNETTE, LTD.

By: /s/ Lauren M. Burnette
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Counsel for Defendant

Dated: April 23, 2024

CERTIFICATE OF SERVICE

I certify that on April 23, 2024, a true copy of the foregoing document was served on all counsel of record by electronic service.

MESSER STRICKLER BURNETE, LTD.

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Dated: April 23, 2024